

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

PETER WILSON, individually and on behalf of all others similarly situated, <i>Plaintiff,</i>	§ § § § § § § § § §	vs.	§	CIVIL ACTION NO. 4:24-CV-04003
TEXONA MARKETING, LLC d/b/a COLLINS GHOSTWRITING, <i>Defendant.</i>				

JOINT MOTION FOR EXTENSION OF TIME

Plaintiff Peter Wilson and Defendant Texona Marketing, LLC d/b/a Collins Ghostwriting, respectfully file this Joint Motion for Extension of Time. The Parties would show unto the Court the following:

STATEMENT OF FACTS

1. The Original Complaint in this matter was originally filed on or about October 18, 2024 (Doc. 1).
2. Defendant filed its answer on January 8, 2025 (Doc. 9).
3. The parties filed an amended proposed Scheduling/Docketing Order on January 24, 2025 (Doc. 13) setting out certain deadlines and a trial setting in this matter. Though the Order has yet to be entered, the Parties have been proceeding according to the deadlines addressed in that filing.

NEED FOR EXTENSION OF TIME

4. Discovery in the matter is ongoing, and the Parties anticipate that this matter will be mediated in September. In an attempt to litigate this matter using the Parties'

respective resources economically, the Parties would like to extend the deadline to designate experts in this matter until after mediation. Accordingly, the Parties are requesting the Court grant an extension as to all deadlines in the proposed Scheduling/Docket Order, other than the deadline to join parties or amend pleadings, by 150 days.

5. A court may grant a request to extend time for good cause. Fed. R. Civ. P. 6(b)(1)(A); see *Jenkins v. Commonwealth Land Title Ins. Co.*, 95 F.3d 791, 795 (9th Cir. 1996).

6. The Parties have filed this Motion for Extension of Time so that justice may be done and not for purposes of delay.

WHEREFORE, PREMISES CONSIDERED, Plaintiff Peter Wilson and Defendant Texona Marketing, LLC d/b/a Collins Ghostwriting respectfully pray that the Court grants this Motion for Extension of Time and for further relief, either at law or in equity, to which they may be justly entitled.

Dated: June 13, 2025

Respectfully submitted,

/s/ Anthony I. Paronich w/ permission

Anthony I. Paronich,
PARONICH LAW, P.C.
350 Lincoln Street, Suite 2400
Hingham, MA 02043
Telephone: (508) 221-1510
Email: anthony@paronichlaw.com
Pro Hac Vice
Attorney for Plaintiff

/s/ Ali A. Hakeem

Ali A. Hakeem
Of Counsel
Sowell, Walls & Powell PLLC
21320 Provincial Blvd.

Katy, Texas 77450
Southern District of Texas Federal ID No.
3644314
Texas Bar No. 24065354
(832) 437-0973
Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on June 13, 2025, I electronically filed the foregoing with the clerk of the court using the CM/ECF system, which will send notification of such filing to the following:

Andrew Roman Perrong
Perrong Law, LLC
2657 Mount Carmel Ave
Glenside, PA 19038
Tel: (215) 225-5529
Fax: (888) 339-0305
Email: a@perronglaw.com

Anthony I. Paronich,
PARONICH LAW, P.C.
350 Lincoln Street, Suite 2400
Hingham, MA 02043
Telephone: (508) 221-1510
Email: anthony@paronichlaw.com
Pro Hac Vice

Attorneys for Plaintiff

/s/ Ali A. Hakeem
Ali A. Hakeem